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February 9, 2023

VIA ECF

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 127. SO ORDERED.

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

A handwritten signature in blue ink, appearing to read 'Jesse M. Furman'.

February 9, 2023

**Re: People of the State of New York v. Arm or Ally, LLC, et al.
S.D.N.Y Case No. 1:22-cv-06124**

Dear Judge Furman:

Our office represents Defendant GS Performance, LLC (“GSP”) in the above-captioned lawsuit. With the consent of all other parties, GSP hereby respectfully requests an extension of the time to respond to Plaintiff’s Motion for a Preliminary Injunction (Dkt. Nos. 77 and 78) until February 20, 2023 (with reply due on March 6, 2023) so that the parties can continue negotiations on a Stipulated Order addressing the issues raised in the referenced Motion.

By way of background, on January 12, 2023, Plaintiff filed a Motion and various supporting documents seeking, in sum, an Order enjoining the Defendants from selling and delivering certain unfinished frames or receivers into New York State pending the entry of a final judgment in this case (Dkt. Nos. 77-85). The parties previously met and conferred, and several Defendants indicated that they may seek to oppose the Motion. On January 24, 2023, Your Honor held a telephonic status conference, and the Order from such conference set a briefing schedule on the Motion with a joint opposition due on February 9, 2023 and Plaintiff’s reply due on February 23, 2023 (Dkt. No. 117).

Since the time of the conference, Defendants have provided Plaintiff with a proposed Stipulated Order which would globally resolve the issues raised in the Motion. Plaintiff recently provided comments and proposed changes to the draft Stipulated Order, and the parties anticipate that they will be able to come to an agreement on the Stipulated Order in the next several days. In the interest of judicial economy, the parties request an extension until February 20, 2023 to submit opposition to the Motion in the event an agreement cannot be reached on the Stipulated Order, with Plaintiff’s reply due on March 6, 2023.

The requested extension will not affect any other case deadlines. We thank Your Honor for his consideration of this request.

Respectfully Submitted,

PISCIOTTI LALLIS ERDREICH, P.C.

s/ Ryan Erdreich

Ryan L. Erdreich

People of the State of New York v. Arm or Ally, LLC, et al.
Page 2

cc: All counsel of record (via ECF)

